

Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ADSTRA, LLC,

Plaintiff,

v.

Case No.

KINESSO, LLC and ACXIOM, LLC,

1:24-cv-0263

Defendants.

9-LJL

CONFIDENTIAL - ATTORNEY'S EYES ONLY

VIDEOTAPED DEPOSITION OF VEENA XAVIER

DATE: Tuesday, September 10, 2024

TIME: 9:08 a.m.

LOCATION: Greenberg Traurig, LLP

One Vanderbilt Avenue, 31st Floor

New York, NY 10017

REPORTED BY: Jessica Moy

JOB NO.: 6908892

1 CONFIDENTIAL

2 one product or a suite of products?

3 A So Real Identity is a suite of
4 products. We've had some branding where
5 we -- so -- so Real ID is the referential
6 Real Identity solution product, but Real
7 Identity --under that, they can't be --
8 there are multiple products -- identity
9 products that we support.

10 Q And what are those identity
11 products?

12 A Don't know all of them, but some
13 of them would be like Visitor Insights,
14 private graphs -- we call them "R graph."
15 Yeah. Those are the ones I can recall.

16 THE REPORTER: I'm sorry. What was
17 the first one that you listed?

18 THE WITNESS: Visitor Insights.

19 THE REPORTER: Thank you.

20 BY MS. BURTON-WALSH:

21 Q What were your other roles in --
22 or rather, what were your other
23 responsibilities at KINESSO other than
24 your role as product manager for Kii?

25 A That was my primary -- yes.